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October 29, 2020

Hon. Andrew E. Krause
U.S. Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Application granted. The discovery deadlines are extended as set forth in this letter -- fact discovery to be completed by 2/1/21, and expert discovery to be completed by 5/20/21. As previously noted, the parties should not automatically expect further extensions to be granted.
Dated: October 30, 2020

SO ORDERED.

Re: *Days v. County of Westchester, et. al.*,
Dkt. No. 18-cv-11538(NSR)(AEK)



ANDREW E. KRAUSE
United States Magistrate Judge

Dear Judge Krause:

I represent Plaintiff Selwyn Days along with Rickner, PLLC. We write jointly with all parties in furtherance of your order issued on October 27, 2020 (DE 132). The order was prompted by a joint request for a 90-day extension of discovery deadlines (DE 131). It directs the parties to advise about remaining discovery deadlines and to propose revised dates for all deadlines, including the completion of all discovery.

The following chart explains the remaining and proposed revised deadlines.

	<u>Remaining Deadlines</u>	<u>Proposed Deadlines</u>
Fact Discovery/Depositions	11/3/20	2/1/21
Defendant to Identify Experts	11/3/20	2/1/21
Plaintiff's Indep. Psych Exam	11/30/20	3/1/21
Expert Reports	12/22/20	3/22/21
Expert Discovery/Depositions	2/1/21	5/3/21
Supplemental Expert Reports	2/19/21	5/20/21
Motion to Quash Dep./Subpoenas	10/30/20	Same
Response to Motion to Quash	11/6/20	Same

In sum, under the proposal fact discovery would be completed by February 1, 2021 and expert discovery would be completed by May 20, 2021.

Thank you for your consideration.

Respectfully submitted,



Glenn A. Garber

cc: All counsel by ECF